



Department of the Interior - Indian Affairs
2013 Environmental Management Assessment and Performance Program

Division of Environmental and Cultural Resources Management
12220 Sunrise Valley Drive
Reston, Virginia 20191

Audit Start Date 2/26/2013 : Audit Completion Date 2/27/2013

**Environmental Management Assessment and Performance
Program(EMAP) Audit Summary Report**
Prepared for EPA

H65-13 Hopi Day School (K-6)-GD
1/4 Mile East of Village Store, P.O. Box 42 - Kykotsmovi,
AZ 86039





EPA Audit Report



H65-13 Hopi Day School (K-6)-GD on 2/26/2013 - 2/27/2013 (EMAP (v 1)) by nsteinke

Miscellaneous Maintenance Wastes

Finding	Days NC
10. Failure to inform employees on handling and operating procedures for universal waste - including emergency response procedures in case of a release. 40 CFR 273.16; or 40 CFR 273.36 (RCRA)	Unknown
Recommended Corrective Actions	
Provide clear instruction and training to employees who have responsibility for managing used batteries, lamps, pesticides and/o mercury containing thermostats. Include emergency response procedures / actions to be taken for releases from leaking containers or broken lamps. Document the instructions and employee training in the record location specified in the EMS.	
Finding	Days NC
15. Failure to clearly label universal waste containers. 40 CFR 273.14(a-e); 40 CFR 273.14 (RCRA)	Unknown
Recommended Corrective Actions	
Clearly label universal waste, or a container used to store universal waste, with any one of the following phrases: "Universal Waste Battery(ies)", or "Waste Battery(ies)", or "Used Battery(ies)"; "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"; "Universal Waste—Mercury Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment" or, "Universal Waste—Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".	
Finding	Days NC
17. Failure to manage universal waste in containers or packages that are structurally sound and adequate to prevent releases. 40 CFR 273.13(a-d); 40 CFR 273.13 (RCRA)	Unknown
Recommended Corrective Actions	
Manage universal waste and contain in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Keep containers and packages closed and routinely monitor for evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. Maintain records of routine monitoring and file in record location specified in the EMS.	

Solid Waste Management

Finding	Days NC
10. Failure to collect solid wastes (or materials which have been separated for the purpose of recycling) in a manner sufficient to inhibit the propagation or attraction of vectors and the creation of nuisances. 40 CFR 243.203(1) (SWDA)	Unknown
Recommended Corrective Actions	
Remove solid waste in a timely manner to inhibit the attraction of vectors and creation of nuisances. Includes materials that have been separated for the purpose of recycling.	

Spill Prevention Control and Countermeasure

Finding	Days NC
20. Failure to provide secondary containment for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation. 40 CFR 112.8(c)(2) (SPCC)	Unknown
Recommended Corrective Actions	
Construct secondary containment for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation. Ensure that diked areas are sufficient to contain spilled oil.	
Finding	Days NC
30. Failure to prepare and implement a SPCC plan. 40 CFR 112.7 (SPCC)	Unknown
Recommended Corrective Actions	
Develop a SPCC plan if above ground containers of 55 gallons or greater exceed a total of 1,320 gallons; or underground storage capacity exceeds a total of 42,000 gallons; or if due to location, a facility could reasonably discharge oil/fuel/chemicals into wetlands or waterways.	



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Toxic Substances Management

Finding	Days NC
55. Failure to have a signed and dated statement from the Designated Representative certifying that AHERA responsibilities have or will be met in the Asbestos Management Plan. 40 CFR 763.93(i) (AHERA)	Unknown
Recommended Corrective Actions	
Place the AHERA certifying statement signed and dated by the Designated Representative in the Asbestos Management Plan and maintained on the EMS SharePoint website.	
Finding	Days NC
54. Failure to inspect all PCB items in storage for leaks every 30 days. 40 CFR 761.65(c)(5)	Unknown
Recommended Corrective Actions	
Inspect all PCB items in the PCB waste storage area for leaks every thirty days. Maintain a written inspection log to verify inspection as specified in 761.180(a)(iii). Develop a SOP for PCB management. Assign staff roles and responsibilities; and provide training. Reference SOP and staff roles/responsibilities in the EMS.	
Finding	Days NC
43. Failure to properly dispose of PCB waste within one year of becoming a waste. 40 CFR 761.65(a)(1)	Unknown
Recommended Corrective Actions	
Properly dispose of PCB waste within one year after becoming a waste by completing a waste manifest. Label waste PCBs with the start accumulation date.	

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A copy of the information provided by IA to the Auditor regarding the date each building at the facility was constructed, if reasonably know is provided as an attachment